

19 MISC 107

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

IN RE NONJUDICIAL CIVIL FORFEITURE :  
PROCEEDING REGARDING \$35,830 IN :  
UNITED STATES CURRENCY SEIZED ON OR :  
ABOUT OCTOBER 15, 2018, :

STIPULATION AND ORDER

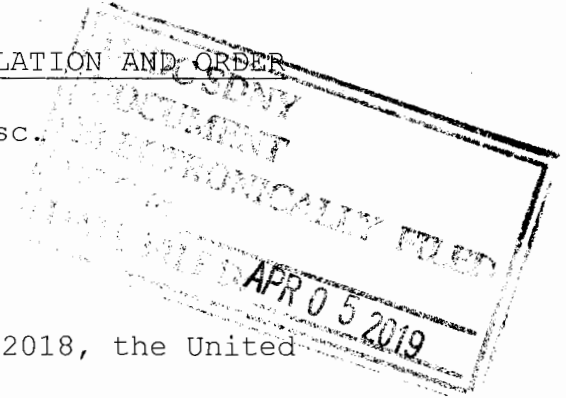
19 Misc.

Defendant-in-rem.

:

:

- - - - - X



WHEREAS, on or about October 15, 2018, the United States Postal Inspection Service (the "USPIS") seized \$139,712 in United States currency (the "Seized Currency") in Flushing, New York and the USPIS initiated an administrative forfeiture proceeding against the Seized Currency pursuant to Title 18, United States Code, Section 981 by timely sending written notice of its intent to forfeit the Seized Currency to all known interested parties;

WHEREAS, on or about January 7, 2019, the USPIS received a claim from Tien-Chih Wang (the "Claimant"), asserting an interest in \$35,830 in United States currency of the Seized Currency (the "Subject Currency");

WHEREAS, the USPIS subsequently referred the matter to the United States Attorney's Office for judicial forfeiture;

WHEREAS, no other party has claimed an interest in the Subject Currency;

WHEREAS, Title 18, United States Code, Section, 983(a)(3)(A) provides that, "[n]ot later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a Court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties";

WHEREAS, pursuant to Title 18, United States Code, Section, 983(a)(3), the United States is required to file a civil complaint to forfeit the Subject Currency no later than April 7, 2019;

WHEREAS, the Claimant, through counsel, Sarah Leddy, Esq. has consented to an extension of the deadline for the Government to file a complaint against the Subject Currency;

WHEREAS, Sarah Leddy, Esq., attorney for the Claimant, represents and warrants that she is authorized to execute this Stipulation and Order on behalf of her client, Claimant, Tien-Chih Wang; and

WHEREAS, the Government requests an extension of 30 days to file a complaint from April 7, 2019 to May 7, 2019;

NOW, THEREFORE, IT IS HEREBY ORDERED, upon agreement of the aforementioned parties and pursuant to Title 18, United States Code, Section 983(a)(3)(A), that the time in which the Government is required to file a complaint for forfeiture of the Subject Currency is extended from April 7, 2019, up to and including May 7, 2019.

AGREED AND CONSENTED TO:

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York  
Attorney for Plaintiff

By: Thane Rehn  
THANE REHN  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
Tel.: (212) 637-2354

4/5/2019  
DATE

By: Sarah Leddy, Esq.  
SARAH LEDDY, ESQ.  
Attorney for Tien-Chih Wang

4/4/2019  
DATE

SO ORDERED:

George B. Donat  
UNITED STATES DISTRICT JUDGE, PART I

4/5/2019  
DATE